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File No: 49952

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

In re:  JASON HOLT  Debtor.	Bankruptcy Case No. 18-29329 JTM Chapter 13  <b>OBJECTION TO PLAN AND MAILING CERTIFICATE</b>
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Bank of America, N.A., (referred to herein as "Secured Creditor") holds a valid Note and lien against Debtor's residence and objects to the Chapter 13 Plan of Debtor as follows:

1. The plan does not provide for Secured Creditor's pre-petition arrearage amount of \$242,196.59.
2. The plan is not feasible. The debtor's plan will pay approximately \$18,600.00, excluding Chapter 13 Trustee commissions and attorney fees and costs, and will fail to pay all of Secured Creditor's arrearages.
3. The plan should treat Secured Creditor in paragraph 3.1, stating arrearages will be paid in the amount of \$242,196.59 and post-petition payments will be paid pursuant to the terms of the Note and Trust Deed, or state that the property is to be surrendered in paragraph 3.5

4. The plan should provide for the full amount of Secured Creditor's trust deed lien and other loan terms remain in effect and are not modified except as expressly provided in the plan.

DATED this 1st day of March, 2019.

/s/ Brian J. Porter

Brian J. Porter

Attorney for Bank of America, N.A.

**MAILING CERTIFICATE**

The undersigned hereby certifies that true and correct copies of the foregoing Objection to Plan and Mailing Certificate were mailed by first class mail, postage prepaid, this 1st day of March, 2019, to each of the following:

Jason Holt  
15001 Eagle Crest Drive  
Draper, UT 84020  
Debtor

United States Trustee  
Via ECF

Theron D. Morrison  
Via ECF  
Debtor's Attorney

Lon Jenkins  
Via ECF  
Chapter 13 Trustee

/s/ Brian J. Porter